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August 3, 2012

STANLEY P. DULL, TREASURER IMMIGRATION911, LLC P.O. BOX 10010 MANASSAS, VA 20108

Response Due Date 09/07/2012

**IDENTIFICATION NUMBER: C00495259** 

REFERENCE: AMENDED YEAR-END REPORT (07/01/2011 - 12/31/2011), RECEIVED 05/30/2012

## Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. Failure to adequately respond by the response date noted above could result in an audit or enforcement action. Additional information is needed for the following 8 item(s):

- 1. Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization (FEC Form 1). Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). (2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d)) If a new treasurer has been appointed, please file an amended Statement of Organization or a letter (if not an electronic filer) to reflect this change.
- 2. The beginning cash balance of this report does not equal the ending balance of your Mid-Year Report (1/1/11-6/30/11). Please correct this discrepancy and amend all subsequent reports(s) that may be affected by the correction. (2 U.S.C. § 434)(b)(1))
- **3.** The totals listed on Line(s) 6(c), 7, 11(a)(ii), 11(a)(iii), 11(d), 13, 19, 20, 21(b), 21(c), 31, and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))

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- **4.** Your amended report discloses an increase in receipts totaling \$20,653 on Line(s) 11(a)(i), 11(a)(ii), and 13 of the Detailed Summary Page and an increase in disbursements totaling \$96,551.33 on Line 21(b) of the Detailed Summary Page from those disclosed on your original report. Please provide clarifying information as to why this activity was not disclosed on your original report. (11 CFR § 104.3)
- **5.** Schedule B supporting Line 21(b) of your report discloses disbursements to credit card companies. When reporting payments to credit card companies, if the payment to the original vendor aggregates in excess of \$200 in a calendar year, you must itemize the name of the original vendor, address, date, amount, and purpose as a memo entry as well as clearly identify the credit card payment to which each memo entry relates. Please amend your report to include the missing information or provide clarifying information if memo items are not required. (11 CFR § 104.9)
- **6.** On Schedule B supporting Line 21(b) of your report, you have itemized disbursements for which you have failed to include the address. Please amend your report to include the missing information. (11 CFR § 104.3(b)(3))
- 7. Itemized disbursements must include a brief statement or description of why each disbursement was made. Please amend Schedule B supporting Line 21(b) of your report to clarify the following description(s): "Website Development/Consulting Expenses" and "Consulting Expenses/Vukovics." For further guidance regarding acceptable purposes of disbursement, please refer to 11 CFR 104.3(b)(3)(i).

Additional clarification regarding inadequate purposes of disbursement published in the Federal Register can be found at http://www.fec.gov/law/policy/purposeofdisbursement/inadequate\_purpose\_lis t\_3507.pdf.

- **8.** Schedule C of your report itemizes loans owed to "Independence Realty, LLC" with an outstanding beginning balance(s) not included on your previous report. Please file an amendment to your report(s) to correct this discrepancy. (11 CFR § 104.11(b))
- Schedule B of your report discloses an expenditure(s) for "Printing and Reproduction," "Marketing <u>Advertising/Facebook</u>," Advertising," "Printing and Reproduction Expenses," "Advertising and Promotion Expenses," "Advertising and Promotion," and "Fild Production Expenses." For your information and consideration when preparing future filings, if a portion or all

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of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1173.

Sincerely,

Ashley Carter

Senior Campaign Finance Analyst

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Reports Analysis Division